How TANF Agencies Support Families Experiencing Homelessness

OMB Information Collection Request
New Collection

Draft Supporting Statement

Part A

June 2020

Submitted By:
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Contents

- **Status of study**
  o This is a new information collection as part of the *How TANF Agencies Support Families Experiencing Homelessness* study.

- **What is being evaluated and measured**
  o This study is considering how state Temporary Assistance for Needy Families (TANF) programs can connect homeless families to the services they need, including TANF-provided services such as cash assistance and child care support, as well as more traditional housing supports such as rapid re-housing programs and subsidized housing. A three pronged information gathering methodology is being used: (1) a public document review of 25 state and U.S. territory state plans (not included in this package); (2) an online survey of all state and territory TANF administrators and a subset of TANF county administrators (included in this package); and (3) virtual site visits to five TANF agencies implementing innovation approaches to addressing family homelessness (included in this package).

- **Type of study**
  o Descriptive study

- **Utility of the information collection**
  o This study will provide information on how the TANF program can serve as a support for families at-risk of or currently experiencing homelessness.
  o Information gathered through this study will assist policymakers and administrators in understanding the ways and the extent to which families experiencing homelessness are utilizing the TANF program, will assist policymakers and administrators in recommending additional examples of practice, and potentially identify approaches worthy of formal evaluation in preparation for replication and scaling.
  o The study is intended to systematically document current uses of the TANF program resources to support families experiencing or at-risk of homelessness and inform future policymaking.

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for data collection activities for a descriptive study aimed at understanding how the Temporary Assistance for Needy Families (TANF) program is assisting families who are currently or at-risk of experiencing homelessness. ACF seeks OMB approval for three data collection instruments that will be used as part of the field assessment:

1. TANF Administrator Web Survey (Attachment A);
2. Discussion Guide for TANF Staff (Attachment B); and

3. Discussion Guide for Staff at Continuums of Care (CoC)/Partner Organizations (Attachment C).

The proposed data collection activities described in this justification will collect information on:
- How states are using TANF support to address homelessness, both directly and indirectly by partnering with local programs;
- The relationships between state agencies, local agencies, and organizations supporting those experiencing homelessness;
- How TANF agencies decided on and implemented their approaches to address homelessness;
- TANF agency staff and partner agency staff perceptions around the approach, including their perceptions of the challenges in implementation, effectiveness, and transferable lessons; and
- How COVID-19 has changed the way states, TANF agencies, and local partners are supporting families experiencing or at-risk of homelessness.

This justification provides supporting statements for each of the eighteen points outlined in Part A of the OMB guidelines.

A.1.1 Study Background

Approximately 480,410 American families experienced sheltered homelessness at some point during 2016, representing one-third of the total homeless population, a 1.7 percent increase since 2007. About three in five people in families experiencing sheltered homelessness (60.9%) were children under 18,[1] and infants under 2 are the most likely age group to experience an episode of homelessness in the past year.[2] The TANF program, administered by ACF's Office of Family Assistance, is a key component in supporting self-sufficiency among low income families, including those currently experiencing or at-risk of homelessness. In 2013, ACF, in recognition of the integral role TANF can play in family stability, released Information Memorandum (TANF-ACF-IM-2013-01[3]), "Use of TANF Funds to Serve Homeless Families and Families at Risk of Experiencing Homelessness" to encourage TANF agencies to identify and implement approaches to better assist these families. As a block grant program, TANF gives wide latitude for state and local innovation in serving eligible populations.

The project *How TANF Agencies Support Families Experiencing Homelessness* (TANF Homeless) is sponsored by ACF's Office of Planning, Research, and Evaluation (OPRE) within HHS. The goal of the project is to assist ACF in understanding the extent to which TANF agencies across the country are using TANF funds to serve and support families experiencing or at-risk of homelessness. As a result, ACF will better understand how TANF agencies are addressing homelessness, be able to recommend additional examples of practice, and potentially identify approaches worthy of further evaluation in preparation for replication and scaling.

A.1.2 Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

A.2.1 Overview of Purpose and Approach

This descriptive study will identify the extent to which TANF agencies across the country are using TANF funds to serve and support families experiencing or at-risk of homelessness. It also will document the approaches and strategies used by TANF agencies to serve these families. ACF is seeking approval of three instruments within this ICR:

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[1] U.S. Department of Housing and Urban Development (HUD), (2017). *2016 Annual Homeless Assessment Report to Congress, Part 2: Estimates of Homelessness in U.S. Washington, D.C.*
https://www.hudexchange.info/resources/documents/2016-AHAR-Part-2-Section-3.pdf

[2] Brown, S.R., M. Shinn, and J. Khadduri, (2017). *Well-being of Young Children after Experiencing Homelessness*. OPRE Report No 201-06. Washington, D.C.: U.S. Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research and Evaluation; and Office of the Assistant Secretary for Planning and Evaluation. https://www.acf.hhs.gov/sites/default/files/opre/opre_homefam_brief3_hhs_children_02_24_2017_b508.pdf

[3] https://www.acf.hhs.gov/ofa/resource/tanf-acf-im-2013-01

- ***TANF Administrator Web Survey*** to administer an online survey to all state and territory TANF administrators as well as a selection of three county TANF administrators from each state. The survey will collect information about the agencies' overall approaches toward addressing family homelessness and the extent to which TANF funds, assessments, tools, additional services, and partners are used in these efforts. The survey will take 30 minutes to complete, and we plan to administer the survey to 206 respondents.
- ***Discussion Guide for TANF Staff*** to conduct interviews with TANF office staff on topics as rationale for strategies; design and implementation plans for approach to addressing family homelessness; partner selection and partnership development for homeless services; details of process clients experience as their housing challenges are uncovered, assessed, and addressed; perceived challenges and successes with approach; resources needed (financial and non-financial) to implement and sustain it; and perceived results or benefits from the approach. Each interview will last approximately 90 minutes. At each site, we expect to conduct up to 10 interviews, for a total of 50 interviews across the five site visits.
- ***Discussion Guide for Staff at CoC/Partner Organizations*** to interview representatives from relevant homelessness organization partners, including Continuums of Care (CoCs), capture their perspective on working with the TANF agency, including development of shared goals, interagency communication approaches, referral strategies, data sharing efforts, challenges and successes, and perceived results of engagement with TANF agency. Each interview will last approximately 90 minutes. At each site, we expect to conduct up to four interviews, for a total of 20 interviews across the five virtual site visits.

Prior to beginning the data collection described above, the study team conducted a systematic review of 25 state and territory TANF agencies' publically available plans and policy documents. The state plans and policy documents are produced in response to TANF funding requirements therefore this initial collection did not impose any burden on respondents or record keepers.

The TANF Administrator Web Survey was conducted between June and August 2019. An in-person pilot site visit occurred in late fall 2018 to test the site visit instruments and refine as needed, while the remaining four visits will be conducted between August and September 2020. During the pilot site visit, we ensured that the same question was not asked of more than nine people to comply with OMB regulations.

A.2.2 Research Questions

ACF is aware that homeless families are accessing TANF cash assistance at similar rates to other families experiencing deep poverty in their same communities.[4] However, currently there is no systematic documentation of the prevalence, breadth, depth, and variety of approaches currently employed by state and county TANF agencies to assist homeless families. Therefore, we seek to

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[4] Burt, Martha R. Jill Khadduri, and Daniel Gubits. *Are Homeless Families Connected to the Social Safety Net?* Homeless Families Research Briefs, OPRE Report No. 2016-33, March 2016. Accessed at: https://www.acf.hhs.gov/opre/resource/are-homeless-families-connected-to-the-social-safety-net

fill this wide knowledge gap through several research questions. This study will assist OPRE in understanding the extent to which TANF agencies across the country are using TANF funds to serve and support families experiencing or at-risk of homelessness. It also will document the approaches and strategies used by TANF agencies to serve these families.

Our research questions are:
- Are states using TANF funds to address homelessness?
  o How did the TANF agencies decide to address homelessness, select one or more approaches, and secure staff buy-in/leadership approval? Was this in response to OFA's memorandum, Use of TANF Funds to Assist Families At-Risk of and Experiencing Homelessness (TANF-ACF-IM-2013-01)?
  o What processes did TANF agencies go through to design and implement their approaches to address homelessness?
- Are states encouraging systems-level changes in alignment and communication between TANF agencies and state, county, or local departments that address homelessness?
  o How are agencies/sites working with local homelessness providers, including CoCs; for example, participating in a coordinated entry process, cross-agency communication, co-location, data sharing, development of shared vocabulary, warm hand-offs, or "cooler" referrals?
- Are states using TANF funds to support local programs to address homelessness? Are there challenges to partnering with local homelessness programs? What other ways are TANF funds being used to support homeless families?
  o Are the provided services helpful in obtaining housing? Are there services that are needed but are not currently available? Are there challenges in accessing services?
- What approaches are states encouraging local offices to use (e.g., screening and assessment, service referral, emergency cash assistance, work requirement waivers)?
- What are TANF staff and partner staff perceptions around the approach; for example, utility, level of effort required, and effectiveness?
- What lessons can be shared with the broader TANF and homelessness communities?
  o Are localities following recommendations? How are local/county TANF offices building relationships with the homelessness field? What are the challenges faced in developing and maintaining these relationships?
  o What steps did agencies take regarding training, data collection, internal communication, marketing, etc., to ensure the approach was actually delivered?

A.2.3 Study Design

The project includes:

(1) a systematic review of 25 state and territory TANF agencies' publically available plans and policy documents;

(2) the TANF Administrator Web Survey administered to all state and territory TANF agencies and three county TANF administrators from each state to collect information about the agencies' overall approaches toward addressing family homelessness and the

extent to which TANF funds, assessments, tools, additional services, and partners are used in these efforts; and
(3) virtual site visits to five purposefully selected TANF agencies to conduct telephone interviews with TANF office staff (using the Discussion Guide for TANF Staff) and interviews with Continuum of Care (CoC) and relevant partners (using the Discussion Guide for Staff at Continuums of Care (CoC)/Partner Organizations).

The systematic review and web survey will help inform the selection of the site visits.

The study is limited by three major factors. First, the small sample size for the qualitative interviews with TANF staff and CoC/partner organization staff means that the results cannot be generalized beyond those communities where we are conducting interviews. Second, only one instrument (the TANF Administrator Web Survey) attempts to capture how all state TANF agencies support families experiencing homelessness. By purposefully selecting the sites to visit virtually, the study team hopes to gain insight into particular approaches to supporting families experiencing homelessness and deepen our understanding of findings gathered from the TANF Administrator Web Survey.

As a result of the limitations identified above, this study is considered preliminary and will likely need to be followed up with a larger-scale representative study.

A.2.4 Universe of Data Collection Efforts

To address the research questions, the study will use three data collection instruments. Instruments in the current request include the following:
1. *TANF Administrator Web Survey* (tailored for both state and county respondents) (Attachment A);
2. *Discussion Guide for TANF Staff*, (Attachment B); and
3. *Discussion Guide for Staff at Continuums of Care (CoC)/Partner Organizations* (Attachment C).

These data are not available through any current source.

Other extant data will be used for the study. These include the following:
1. State TANF Plans
2. Other TANF Policy Documents, as identified through targeted web searches
3. The 2013 ACF memo (TANF-ACF-IM-2013-01) "Use of TANF Funds to Serve Homeless Families and Families at Risk of Experiencing Homelessness."
4. Reports and summaries from previous studies on the TANF program

Exhibit A-1 provides a crosswalk between the research questions and the study's data collection tasks.

Exhibit A-1: Research Questions and Study Components

Research Question	TANF Document Review	TANF Administrator Survey	Discussion Guide for TANF Staff	Discussion Guide for Staff at CoC/ Partner Organizations
Are states using TANF funds and efforts to address homelessness?	✓	✓		
Are states encouraging systems-level changes in alignment and communication between TANF agencies and state, county, or local departments that address homelessness?	✓	✓		
Are states using TANF funds to support local programs to address homelessness? Are there challenges to partnering with local homelessness programs? What other ways are TANF funds being used to support homeless families?	✓	✓		
What approaches are states encouraging local offices to use (e.g., screening and assessment, service referral, emergency cash assistance, work requirement waivers)?	✓	✓	✓	✓
Are localities following recommendations? How are local/county TANF offices building relationships with the homelessness field? What are the challenges faced in developing and maintaining these relationships?		✓	✓	✓
How did the TANF agencies decide to address homelessness, select one or more approaches, and secure staff buy-in/leadership approval? Was this in response to OFA's memorandum, *Use of TANF Funds to Assist Families At-Risk of and Experiencing Homelessness* (TANF-ACF-IM-2013-01)?		✓	✓	✓
What processes did TANF agencies go through to design and implement their approaches to address homelessness?			✓	✓
What steps did agencies take regarding training, data collection, internal communication, marketing, etc., to ensure the approach was actually delivered?			✓	✓
How are agencies/sites working with local homelessness providers, including CoCs; for example, participating in a coordinated entry process, cross-agency communication, co-location, data sharing, development of shared vocabulary, warm hand-offs, or "cooler" referrals?		✓	✓	✓
What are TANF staff and partner staff perceptions around the approach; for example, utility, level of effort required, client/participation satisfaction, and effectiveness?	✓	✓	✓	✓
Are the provided services helpful in obtaining housing? Are there services that are needed but are not currently available? Are there challenges in accessing services?			✓	✓
What lessons can be shared with the broader TANF and homelessness communities?			✓	✓

A3. Improved Information Technology to Reduce Burden

By conducting the survey of TANF administrators online, we hope to reduce burden on the survey respondents. Respondents will be able to access and complete the survey at their

convenience. The survey includes close-ended questions that will be programmed with radio buttons and drop-down responses so that respondents can quickly choose their answers and move through the survey.

During the interviews, we will capture audio recordings to ensure the accuracy of our notes, and also reduce the number of instances that the study team has to reach out to respondents to confirm their statements.

A4. Efforts to Identify Duplication

To the study team's knowledge, this is the first attempt to collect primary data on how TANF agencies support families experiencing homelessness.

The study will collect information from TANF Administrators in five states and up to 15 counties twice: first, during the TANF Administrator Web Survey, and second, during the site visit. To minimize burden, the study team will review the respondents' answers to the web survey before the virtual visit, and focus questions on topics that are not already covered by the web survey.

In addition, while the TANF Administrator Web Survey is being reviewed by OMB, we will begin programming the TANF Administrator Web Survey into Survey Gizmo, an online survey platform. After programming the survey, we will pre-test the survey with two TANF agencies and one county to ensure that all questions are clear. This pretest will occur prior to OMB passback so that the final questions will incorporate OMB feedback. To minimize burden, we will provide the answers from the pre-test to these agencies, allowing them to confirm and update any information when we field TANF Administrator Web Survey.

A5. Involvement of Small Organizations

The study team may interview small partner organizations working with state or local TANF agencies. To minimize burden, the team will work to set up interviews at times and in places (e.g., their offices) that are convenient to participants.

A6. Consequences of Less Frequent Data Collection

This is a onetime data collection.

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

A8. Federal Register Notice and Consultation

A.8.1 Federal Register Notice and Comments

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on

May 17, 2018, Volume 83, Number 96, page 22982, and provided a sixty-day period for public comment. A copy of this notice is attached as Attachment 1. During the notice and comment period, no substantive comments were received.

A.8.2 Consultation with Experts Outside of the Study

Phone consultations were conducted with four non-federal experts in the field: Sharon MacDonald (National Alliance to End Homelessness); Elizabeth Lower-Basch (the Center for Law and Social Policy (CLASP) Donna Pavetti (the Center on Budget and Policy Priorities); and Katie Griego (National Association of State TANF Administrators).

An important component of the TANF Homeless project is engaging relevant stakeholders during the design and implementation of the study. The study will benefit from the expertise of organizations representing TANF agencies and homelessness assistance programs. The two key organizations are the National Association of State TANF Administrators (NASTA) and the National Alliance to End Homelessness (NAEH). We engaged these stakeholders in the project to provide feedback and critique of the study's TANF Administrator Web Survey instrument. We also asked NASTA to reinforce with their members the importance of completing the TANF Administrator Web Survey. Later in the project, we will seek assistance from these organizations to promote the study and disseminate its findings through their membership networks.

A9. Incentives for Respondents

There are no incentives for respondents in this study.

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. The study instruments provided in Attachments B (*Discussion Guide for TANF Staff*), and C (*Discussion Guide for Staff at Continuums of Care (CoC)/Partner Organizations*), include both consent language and introductory scripts (see *Accompanying Communications for TANF Administrator Web Survey*, Attachment E). The study's instruments and consent forms received approval from Abt Associates' IRB on April 11, 2018.

As specified in their contract, the research team will protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The research team has developed a Data Security Plan that assesses all protections of respondents' personally identifiable information. Members of the research team are all trained on data privacy issues and will comply with the above requirements.

The unit of analysis for the qualitative site visits is the site, not the individual respondents. Respondents to the qualitative site visit interviews will be told that all of their responses will be kept private, their names will not appear in any written reports, and that responses to the questions are voluntary. To prevent possible re-identification of any staff interviewed as part of

the site visits to TANF agencies and partner organizations, the research team will not attribute any comments to staff by name or job categories.

As specified in the evaluator's contract, the Contractor will use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The Contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The Contractor shall: ensure that this standard is incorporated into the Contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, the Contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or personally identifiable information that ensures secure storage and limits on access.

Information will not be maintained in a paper or electronic system from which they are actually or directly retrieved by an individuals' personal identifier.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Newly Requested Information Collections

Total Annual Cost

Exhibit A-2 demonstrates the projected burden hour estimates for data collection for the three elements of the study: (1) the *TANF Administrator Web Survey* (tailored for both state and county respondents) (2) a *Discussion Guide for TANF Staff*, and (3) a *Discussion Guide for Staff at Continuums of Care (CoC)/Partner Organizations*. The annualized cost burden to respondents is based on the estimated burden hours and the assumed hourly wage rate for respondents. We estimated the average hourly wage for each respondent group based on information from the Bureau of Labor Statistics[5] or the federal minimum wage. We calculated the average hourly rate for each respondent group using the following categories:

- TANF Administrator Web Survey: Social and Community Service Manager Occupations (SOC 11-9151): wage rate of $33.91, plus a 40 percent adjustment for benefits, or $47.47.
- Discussion Guides for TANF Staff and Staff at CoC/Partner Organizations: Community and Social Service Occupations (SOC 21-0000): wage rate of $ 23.10 plus a 40 percent adjustment for benefits, or $32.34.

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[5] http://www.bls.gov/oes/current/oes_nat.htm

See the Exhibit A-2 below for estimated annual cost burden for each type of data collection instrument.

Exhibit A-2: Total Burden Requested Under this Information Collection

Instrument	Total Number of Respondents	Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
TANF Administrator Web Survey (State and County)	206	69	1	.5	35	$47.47	$1,161.45
Discussion Guide for TANF Staff	50	17	1	1.5	26	$32.34	840.84
Discussion Guide for Staff at CoC/Partner Organizations	20	7	1	1.5	11	$32.34	$355.74
				Estimated Annual Burden Total	72		$2,358.03

*This table assumes a three year burden period.

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities will be $132,248. Annual costs to the Federal government will be $44,083 for the proposed data collection.

A15. Change in Burden

This is a new data collection.

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Data from the TANF Administrator Web Survey will be analyzed and used to document efforts of state and county TANF agencies to assist families experiencing homelessness, as well as to inform site selection. Data collected using the Discussion Guide for TANF Staff will be used to create summaries of site visits, which will provide OPRE in-depth understanding of each state's approach. These summaries will inform the writing of the study's final report and three related policy briefs. The report and policy briefs will assemble comprehensive information about how states and localities use TANF funds to respond to family homelessness. If possible, we will also indicate areas for future technical assistance for TANF agencies and CoCs, and highlight practices that either have an evidence base or seem ready for more formal evaluation of their effectiveness.

Time Schedule and Publication

Exhibit A-3 presents an overview of the project schedule for information collection and publication. Pending OMB approval of proposed instruments, data collection will conclude by October 2020. Findings from the analysis of the information collected through on-site interviews and focus groups will be presented by the research contractor in a final research report, anticipated in spring 2021. This report will be publicly disseminated through OPRE and Abt Associates and its partner, MEF Associates. Abt and MEF will notify TANF agencies that participated in the survey and site visits when the final report and any other related publications are publicly released.

Exhibit A-3: Overview of Project Data Collection Schedule

Data Collection or Publication Activity	Schedule for Completion
TANF Administrator Web Survey	Summer 2019
Site Visits (which will include use of the Discussion Guide for TANF Staff, Discussion Guide for Staff at Continuums of Care (CoC)/Partner Organization)	Summer 2020
Policy Brief #1	Fall 2020
Policy Brief #2	Winter 2020
Policy Brief #3	Winter 2020
Final Report	Spring 2021

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.